

EXHIBIT E

Defendant's Document Requests - 15 Day Extension for Objections and Production

Leslie McAdoo Gordon <leslie.mcadoo@mcadoolaw.com>

Thu 8/18/2022 4:26 PM

To: Terry Reed <tgreed@lrfirm.net>

Terry: I see from your Document Requests that you did not extend the deadlines by 15 days for objections or production, notwithstanding that I advised you in writing even before you served them that my trial schedule would make it impossible for me to comply with the ordinary deadlines.

Will you agree to extend both deadlines by 15 days?

Leslie

Leslie McAdoo Gordon
McAdoo Gordon & Associates, P.C.
1629 K Street, N.W.
Suite 300
Washington, DC 20006
(202) 704-7388
mcadoolaw.com

Lokhova Deposition Date; Motion for Protective Order; Notice of Hearing Date

Leslie McAdoo Gordon <leslie.mcadoo@mcadoolaw.com>

Thu 8/18/2022 6:12 PM

To: Terry Reed <tgreed@lrfirm.net>

Terry: I was surprised to receive from you a notice of deposition for Ms. Lokhova without any prior consultation with me as to her or my availability. I have never had this happen before in any case I have litigated in the E.D. Va. I was doubly surprised because, as you know, I have been in trial and Ms. Lokhova resides overseas and is also the full-time caregiver for her pre-school age child.

As professionals, we will need to co-ordinate things like party and expert depositions. Obviously, we are both going to take depositions of the other party and our experts. Those do not need to be done at this early stage of the discovery phase, however.

Will you agree to consider your deposition notice for Ms. Lokhova as a placeholder pending our agreement on a mutually acceptable date? I would propose to depose Mr. Halper in the same week so that Ms. Lokhova may attend his deposition if she chooses as well.

I also note that you have served interrogatories on me on August 1, although I had previously advised you orally and in writing that I was preparing for a criminal trial in federal court that commenced on August 8 and lasted through August 15 and so would need a 15-day extension for any discovery responses. If you will not agree to extend the deadlines for objections and responses to these discovery requests and to treat the deposition notice for Ms. Lokhova as a placeholder, then I will be filing a Motion for Protective Order tomorrow and noticing it for a hearing on September 9th, although we can certainly discuss the motion with Magistrate Fitzgerald next week instead if you like.

Leslie

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